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**MEMORANDUM ENDORSED**

May 19, 2024

By ECF

The Honorable Gregory H. Woods  
United States District Judge  
United States District Court  
Southern District of New York  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl Street  
New York, NY 10007

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**Re: *United States v. Gannon Bond*, 24 Cr. 091 (GHW)**

Dear Judge Woods:

This letter is respectfully submitted to request that the Court temporarily modify the conditions of Mr. Bond's release to permit him to travel to Oregon with his family from June 9, 2024, through June 20, 2024. As the Court may recall, Mr. Bond's mother lives in Oregon and posted her property to secure his appearance bond. It is tradition for Mr. Bond to take his children to visit her during the school holidays.

Pretrial Services and the Government have no objection to this request. Pretrial Services Officer Kristen McKeown notes that Mr. Bond is in full compliance with the conditions of his release and reports as directed.

Thank you for your consideration.

Respectfully submitted,

/s/ James Kousouros  
James Kousouros, Esq.  
Counsel for Mr. Bond

Cc. All Counsel of Record (By ECF)


Kristen McKeown  
Senior U.S. PTS Officer

Jazzlyn A. Harris  
U.S. PTS Officer Assistant

APPLICATION GRANTED. The conditions of the defendant's release are modified as follows: Mr. Bond may travel to Oregon with his family from June 9, 2024 to June 20, 2024. All other conditions of Mr. Bond's release remain in full effect.

The Clerk of Court is directed to terminate the motion pending at Dkt. No. 51.  
SO ORDERED.

Dated: May 20, 2024  
New York, New York

  
GREGORY H. WOODS  
United States District Judge